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MEMO ENDORSED

December 19, 2013

BY FAX

Re: United States v. Glenn Guzman, 11 Cr. 1015 (LTS)

Hon. Laura Taylor Swain
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Dear Judge Swain:

I represent the Defendant Glenn Guzman in the above-captioned matter and am writing to request temporary modifications to Mr. Guzman's home confinement conditions so that he may attend both a Christmas Eve and New Year's Eve gathering with his family. Under his current bail conditions, Mr. Guzman is on home confinement. He is only permitted to leave his residence to attend work, medical appointments, and other activities approved in advance by the pretrial services department.

On December 24, 2013, several of Mr. Guzman's relatives will gather at the home of Mr. Guzman's aunt, Belkis Guzman, located at 2250 Grand Concourse, Apt. 11, Bronx, NY 10457. I respectfully request a temporary modification to Mr. Guzman's bail conditions so that he may travel to Belkis Guzman's home from 4:00 p.m. to 11:00 p.m. on December 24, 2013.

In addition, on the evening of December 31, 2013, several members of Mr. Guzman's family will gather at the home of his cousin Mayra Guzman, located at 845 Kinsella Street, Bronx, NY 10462. Mr. Guzman hopes to attend this family celebration. Accordingly, I respectfully request an additional modification to Mr. Guzman's bail conditions so that he may travel to Mayra Guzman's home on December 31, 2013 at 6:00 p.m. and return to his own home on January 1, 2014 at 1:00 a.m.

Mr. Guzman's pre-trial services officer, Gianfranco Furelli, has opposed Mr. Guzman's request, referring Mr. Guzman to the response pre-trial services made to Mr. Guzman's request for bail modification when he requested time to attend a family Thanksgiving dinner. In that response, pre-trial services noted that the District's policy is to oppose all requests that concern occasions that are not "once in a lifetime" events. Although

SIMPSON THACHER & BARTLETT LLP

Hon. Laura Taylor Swain

-2-

December 19, 2013

he opposed the request, Mr. Furelli noted that Mr. Guzman has been compliant with his conditions of release.

The Government has been informed of Mr. Guzman's request, and Mr. Poscablo has informed us that the Government takes no position.

Thank you for your consideration.

Respectfully submitted,

Mark J. Stein / JTM

Mark J. Stein

AUSA Ryan Poscablo (by email) cc: AUSA Jessica Ortiz (by email)

The regrest 15 granted as to both gatherings.

SO OPPENDED.

12/19/13